

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**In re: Asbestos Litigation
Coordinated Docket**

ROSALIA G. ADELSFLUGEL, Individually) C.A. NO. 2:08-811
and as Personal Representative of the Estate of)
ALBERT B. ADELSFLUGEL,)

Plaintiffs,)

vs.)

NOTICE OF REMOVAL

OWENS-ILLINOIS, INC.,)
BAYER CROPSCIENCE, INC.,)
as successor in interest to Amchem Products, Inc.,)
CRANE CO.)
DURABLE MANUFACTURING COMPANY,)
GARLOCK SEALING TECHNOLOGIES LLC,)
GENERAL ELECTRIC COMPANY,)
GOULDS PUMPS, INCORPORATED,)
FOSTER WHEELER ENERGY CORP.,)
INDUSTRIAL HOLDINGS CORPORATION,)
f/k/a The Carborundum Company,)
INGERSOLL-RAND COMPANY,)
METROPOLITAN LIFE INSURANCE COMPANY,)
NATIONAL SERVICE INDUSTRIES, INC.,)
f/k/a North Brothers, Inc.,)
D. B. RILEY, INC.,)
SEALING EQUIPMENT PRODUCTS)
COMPANY, INC.,)
UNION CARBIDE CORPORATION,)
WARREN PUMPS, INC., a member of the)
Colfax Pump Group,)
CBS CORPORATION, f/k/a VIACOM, INC.,)
Successor by merger to CBS Corporation,)
f/k/a Westinghouse Electric Corporation,)

Defendants.)

Bayer Cropscience, Inc. and Union Carbide Corporation, acting for themselves and the other proper defendants, would respectfully show unto the Court in support of their Notice of Removal:

1. Bayer Cropscience, Inc. and Union Carbide Corporation are defendants in the above-entitled action.

2. The above-entitled action was instituted by the plaintiffs against Bayer Cropscience, Inc. and Union Carbide Corporation, as defendants, by the service of a Summons and Complaint on or about February 11, 2008, and this action is now pending in the court of Common Pleas for Charleston County, South Carolina.

3. At the time of the commencement of the action, the plaintiffs were and still are citizens of the State of South Carolina, and Bayer Cropscience, Inc. and Union Carbide Corporation, as well as all of the other defendants herein, were at the time of the commencement of this action and still are corporations organized and existing under and by virtue of the laws of jurisdictions other than South Carolina and having their principal place of business in a jurisdiction other than South Carolina.

4. This action accordingly is of a civil nature and involves a controversy wholly between citizens of different states and the value of the matter in dispute in said cause exceeds the sum of Seventy-Five Thousand and no/100 Dollars (\$75,000.00), exclusive of interest and costs, as appears from the allegations contained in plaintiff's Complaint, and said action is one over which the District Court of the United States has original jurisdiction.

5. This action accordingly is of a civil nature and is one over which the District Court of the United States has original jurisdiction.

6. That filed herewith is a copy of all process, pleadings and orders served upon the defendants in this action.

7. That the Clerk of the Court of Common Pleas for Charleston County, South Carolina, has been provided a copy of this Notice of Removal.

8. All other proper defendants consent to the removal of the case.

HAYNSWORTH SINKLER BOYD, P.A.

By /s/ W. David Conner

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Attorneys for Defendants Bayer Cropscience, Inc.
and Union Carbide Corporation

March 6, 2008

DEFENDANT DEMANDS JURY TRIAL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Removal was mailed to the following the 7th day of March, 2008:

V. BRIAN BEVON
MOTLEY RICE LLP
P. O. Box 1792
MT. PLEASANT, SC 29465
Attorneys for Plaintiffs

/s/ W. David Conner